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REMARKS

Claims 1-42 are currently pending.

35 U.S.C. §103 Rejection

The Office Action rejected claims 1, 6-21, and 27-33 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,882,598 to *Lindquist et al.* (hereinafter "*Lindquist*") in view of WO 02/15255 A1 to *Tan* (hereinafter "*Tan*"). The Applicant respectfully traverses the rejection.

In maintaining the rejection, the Office Action neglected to establish the motivation to combine the references. When the Office Action fails to show a motivation to combine the references, a *prima facie* case of obviousness has not been established. *In re* Rouffet, 149 F.3d 1350, 47 USPQ 2d 1453 (Fed. Cir. 1998). Accordingly, as the Office Action has failed to establish the motivation for combining the references, the Applicant respectfully submits that a *prima facie* case of obviousness has not been established.

Furthermore, according to Chapter 2134 of the M.P.E.P., in order to establish *prima facie* obviousness of a claimed invention, "all the limitations must be taught or suggested." The Applicant submits that neither *Lindquist* nor *Tan*, either singularly or in combination, disclose or suggest all the features recited in claims 1, 6-21, and 27-33.

More specifically, claim 1 recites a method for cleaning silicon carbide materials which comprises, among other features, "using an integrated system that is adapted for handling a multiplicity of said silicon carbide materials during said cleaning." Neither of the references, either

alone or in combination, discloses or suggests this feature. While *Lindquist* does disclose a cassette 10 which holds wafers, the cassette 10 is not "adapted for handling a multiplicity of said silicon carbide materials." Likewise, *Tan* does not disclose this feature.

In addition, claim 1 recites "ultrasonicating said silicon carbide materials in an aqueous solution of inorganic acid" and "ultrasonicating said silicon carbide materials in a bath of de-ionized water." The Applicant submits that neither of the references disclose or suggest this feature. As correctly pointed out in the Office Action, *Lindquist* does not disclose ultrasonicating silicon carbide in an aqueous solution of inorganic acid. *See e.g.*, the Office Action at page 2. In addition, *Lindquist* does not disclose ultrasonicating silicon carbide in a bath of de-ionized water. Similarly, *Tan* does not disclose these features. Specifically, Tan does not disclose ultrasonicating silicon carbide in an aqueous solution of an inorganic solution and in de-ionized water. Accordingly, for this reason and the reasons detailed above, the Applicant respectfully submits that claim 1 is patentable over *Lindquist* in view of *Tan* and respectfully requests that the rejection be withdrawn. In a similar fashion, claims 6-21 and 27-33, which depend from claim 1, are also patentable for at least the same reasons.

The Office Action also rejected claims 2 and 3 under 35 U.S.C. §103(a) as being unpatentable over *Lindquist* in view of *Tan* as applied to claims 1, 6-21, and 27-33 above, and further in view of the Applicant's Related Art (hereinafter "the *ARA*"). The Applicant traverses the rejection.

As detailed above, claim 1, the base claim from which claims 2 and 3 depend, is patentable over *Lindquist* in

view of *Tan*. In addition, the *ARA* does not address the previously noted shortcomings of *Lindquist* in view of *Tan*. In particular, the *ARA* does not provide the necessary motivation to combine *Lindquist* and *Tan*. In addition, the *ARA* does not disclose or suggest "an integrated system that is adapted for handling a multiplicity of said silicon carbide materials during said cleaning." Likewise, the *ARA* does not disclose or suggest "ultrasonicating said silicon carbide materials in an aqueous solution of inorganic acid" and "ultrasonicating said silicon carbide materials in a bath of de-ionized water." Therefore, claims 2 and 3 are patentable over the cited references and the Applicant respectfully requests that the rejection be withdrawn.

In addition, the Office Action rejected claims 4 and 5 under 35 U.S.C. §103(a) as being unpatentable over *Lindquist* in view of *Tan* as applied to claims 1, 6-21, and 27-33 as noted above and further in view of U.S. Patent No. 6,273,950 to *Kitabatake* (hereinafter "*Kitabatake*"). The Applicant traverses the rejection.

As mentioned earlier, claim 1, the base claim from which claims 4 and 5 depend, is patentable over *Lindquist* in view of *Tan*. Moreover, *Kitabatake* does not provide the necessary motivation to combine *Lindquist* and *Tan*. In addition, *Kitabatake* does not overcome the previously noted shortcomings of both *Lindquist* and *Tan*, namely the integrated system and the ultrasonicating steps. As such, claims 4 and 5 are patentable over the cited references and the Applicant respectfully requests that the rejection be withdrawn.

The Office Action also rejected claims 22-26 under 35 U.S.C. §103(a) as being unpatentable over *Lindquist* in view of *Tan* as applied to claims 1, 6-21, and 27-33 above and

further in view of U.S. Patent No. 6,352,081 to *Lu et al.* (hereinafter "*Lu*") or U.S. Patent No. 5,660,640 to *Laube* (hereinafter "*Laube*"). The Applicant traverses the rejection.

As discussed above, claim 1, the base claim from which claims 22-26 depend, is patentable over *Lindquist* in view of *Tan*. In addition, neither *Lu* nor *Laube* provide the necessary motivation to combine *Lindquist* and *Tan*. Furthermore, neither *Lu* nor *Laube* address the additional shortcomings of both *Lindquist* and *Tan*. As such, the Applicant respectfully submits that claims 22-26 are patentable over the cited references and respectfully requests that the rejection be withdrawn.

The Office Action also rejected claims 34-42 under 35 U.S.C. §103(a) as being unpatentable over *Lindquist* in view of *Tan* as applied to claims 1, 6-21, and 27-33 above and further in view of U.S. Patent No. 5,863,801 to *Southgate et al.* (hereinafter "*Southgate*") or U.S. Patent No. 5,749,467 to *Gregerson* (hereinafter "*Gregerson*"). The Applicant traverses the rejection.

As detailed above, claim 1, the base claim from which claims 34-42 depend, is patentable over *Lindquist* in view of *Tan*. In addition, neither *Southgate* nor *Gregerson* provide the necessary motivation to combine *Lindquist* and *Tan*. Also, neither *Southgate* nor *Gregerson* overcome the previously discussed problems of both *Lindquist* and *Tan*. As such, the Applicant respectfully submits that claims 34-42 are patentable over the cited references and respectfully requests that the rejection be withdrawn.

Additionally, the Office Action rejected claim 39 under 35 U.S.C. §103(a) as being unpatentable over *Lindquist* in view of *Tan* as applied to claims 1, 6-21, and 27-33 as

previously noted and further in view of TW 460611 to *Yang et al.* (hereinafter "*Yang*"). The Applicant respectfully traverses the rejection.

As mentioned above, claim 1, the base claim from which claim 39 depends, is patentable over *Lindquist* in view of *Tan*. *Yang* does not provide the necessary motivation to combine *Lindquist* and *Tan*. Furthermore, *Yang* does not address the previously detailed shortcomings of both *Lindquist* and *Tan*. As such, the Applicant respectfully submits that claim 39 is patentable over the cited references and respectfully requests that the rejection be withdrawn.

Conclusion

The Applicant believes all the pending claims are in a condition for allowance, and respectfully requests reconsideration and allowance of the same.

A separate Request for Extension of Time is transmitted herewith, with authorization to charge deposit account No. 04-1696 the requisite extension fee. The Applicant does not believe any other fees are due regarding this amendment. If any additional fees are required, however, please charge Deposit Account No. 04-1696. The Applicant

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encourages the Examiner to telephone Applicant's attorney to discuss the amendment should any issues remain.

Respectfully submitted,

Brian M. Dugan, Esq.
Registration No. 41,720
Dugan & Dugan, PC
Attorneys for the Applicant
(914) 332-9081

Dated: July 24, 2006
Tarrytown, New York